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August 13, 2003

**Ex Parte Presentation**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: *Application by SBC Communications Inc., et al. for Provision of In-Region, InterLATA Services in Illinois, Indiana, Ohio, and Wisconsin,*  
WC Docket No. 03-167

Dear Ms. Dortch:

Pursuant to the Commission's filing requirements relating to section 271 applications, I am attaching, on behalf of SBC Communications Inc. ("SBC"), information that SBC provided earlier today to the Department of Justice relating to the above-referenced application. In accordance with this Commission's Public Notice, DA 03-2344 (July 17, 2003), SBC is filing this letter and its attachment electronically through the Commission's Electronic Comment Filing System.

Yours truly,



Colin S. Stretch

**Attachment**

cc:	Pam Arluk	Hisham Choueiki
	Ben Childers	Nicholas Linden
	Janice Myles	Layla Seirafi-Najar
	Jon Feipel	Qualex International
	Karl Henry	

1. AT&T alleges that “[b]ecause a service order needs to post to SBC’s billing systems before the end user is treated by SBC’s OSS as an AT&T customer, AT&T is effectively unable to send a subsequent order on the same end user’s account . . . until posting has occurred” and AT&T has received a Post to Bill (PTB) notification (which AT&T refers to as a Billing Completion, Notice or “BCN”). *See* DeYoung/Willard Decl. ¶ 63. AT&T’s allegations are incorrect.

In the case of a UNE-P migration in the Midwest region, SBC’s OSS systems treat the end-user account as effectively migrated to the new local service provider upon completion of provisioning. The service order confirmation (“SOC”) provides notice to the CLEC that provisioning has been completed. In most cases, the customer service information (“CSI”) for the end-user is updated in the ACIS database to reflect the CLEC as the “owner” of the account, within 24 hours of the SOC. As illustrated by Attachment D to the Brown/Cottrell/Flynn Affidavit, the update to the ACIS database occurs well before the update to the CABS billing database. Thus, the CLEC is reflected in SBC Midwest’s systems as the owner of the account on a UNE-P migration prior to any update to the CABS billing system.

When a subsequent change order is received on a UNE-P migration, SBC Midwest’s systems will check to see if the CLEC is reflected as the “owner of the account” in the ACIS database. If the CSI has been updated to reflect the CLEC as the owner, the change order will process without rejecting back to the CLEC – regardless of whether the CABS database has been updated.

Further, SBC Midwest’s systems perform a “pending order” check upon receipt of a change order if the ACIS CSI does not reflect the CLEC that sent the order as the account owner. On full migrations, if the systems find a pending service order in “2P” status (meaning a FOC has been sent), SBC’s electronic systems and manual processes are designed to process the CLEC’s subsequent change order without reject even if the CSI has not yet been updated. This means that change orders on full UNE-P migrations can be submitted and processed without reject, upon the CLEC’s receipt of the FOC notification on the migration order. The same “pending order” functionality will be operational for partial migrations effective August 27, 2003.

2. CIMCO alleges that SBC’s LSOG 5 requires a two-step process (manual pre-order and electronic order) for complex orders, compared to the one-step electronic ordering process formerly available under LSOG 4.

Under LSOG 4, CLECs in the Midwest region were not required to reserve telephone numbers (“TNs”) as part of the pre-order process for complex services; rather, they could submit electronic local service requests (“LSRs”) for complex services containing “placeholders” for the TNs. When the LSR fell out for manual handling – as all complex orders do – the LSC would perform the tasks of reserving TNs on the CLEC’s behalf and of using those TNs to create the service orders necessary to process the CLEC’s request.

Thus, while the order may have appeared to the CLEC to be an electronic “one step” process, it was always a two-step manual process for the LSC in the Midwest region, which executed both the pre-order and ordering steps. In SBC’s other regions, CLECs submitting complex orders have consistently been required to submit a manual pre-order request for TN reservation prior to submitting their LSRs.

The Uniform and Enhanced Plan of Record (U&E POR) process identified or created uniform and enhanced interfaces and processes to facilitate the pre-ordering, ordering, and other functions by which CLECs order and deploy resold services and UNEs from SBC’s regions, including Ameritech, SWBT, SNET, and PB/NB. The U&E POR was a collaborative process open to participation for all CLECs, including CIMCO. In April 2002, effective with the release of LSOG 5 as part of the U&E POR, SBC moved to a uniform 13-state platform for both pre-ordering and ordering functions. As a result, the Midwest region adopted the same manual pre-order process for TN reservations as that used in the other SBC states. SBC communicated the details of this process to the CLECs via Accessible Letter CLECAM02-198 (May 14, 2002) (App. I, Tab 29).

As described in the Accessible Letter, the pre-order process for complex orders requires CLECs to fax a complete LSR when requesting TN reservations.<sup>1</sup> The purpose of requiring the LSR was to enable the LSC to complete an initial review of the order, and advise the CLEC of errors that might impact the LSR when it was submitted (either electronically or manually) as part of the ordering process. However, SBC now understands that this process has become cumbersome and is committed to streamlining this process by requiring CLECs to submit only those fields needed to reserve the TNs. SBC has been working with CIMCO to determine precisely what needs to be submitted during the pre-order phase to reserve the TNs. SBC expects to have a streamlined process implemented for all CLECs by September 10, 2003.

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<sup>1</sup> While the term “fax” typically connotes a process by which a person (in this case the CLEC employee) stands at a fax machine with a piece of paper, advances in fax technology allow for solutions that are much more efficient for the sender. For example, CLECs may configure a fax server so that electronic documents can be sent via fax from any CLEC employee’s desktop. Implementation and use of such a process is relatively simple and avoids many of the inefficiencies cited by CLECs when complaining about manual fax processes.